

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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LINDSAY LOHAN,

CASE NO.: 2:11-cv-05413-DRH-ARL

Plaintiff,

vs.

ARMANDO CHRISTIAN PEREZ *p/k/a* PITBULL,  
SHAFFER CHIMERE SMITH, JR., *p/k/a* NE-YO, NICK  
VAN DE WALL *p/k/a* AFROJACK, J RECORDS, SONY  
MUSIC ENTERTAINMENT, SONY MUSIC HOLDINGS  
INC., RCA MUSIC GROUP, POLO GROUNDS MUSIC,  
POLO GROUNDS MUSIC PUBLISHING, INC., POLO  
GROUNDS MUSIC, INC., MR. 305, INC., MR. 305  
ENTERPRISE, INC., and JOE JOHN AND JANE JOHN,  
1 THROUGH X,

Defendants.

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**NOTICE OF MOTION**

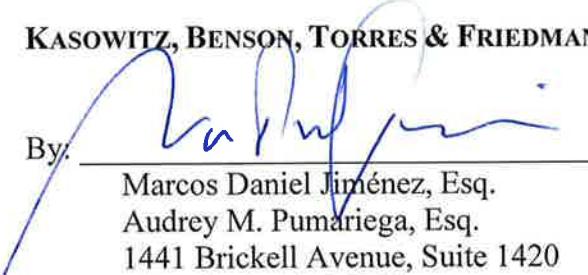
PLEASE TAKE NOTICE that, upon the accompanying Declaration of Audrey M. Pumariega in support of Defendants' Memorandum of Law in Support of Defendants' Motion for Sanctions ("Memorandum of Law"), attaching Exhibits A-D, the Memorandum of Law, and all of the pleadings and proceedings heretofor had herein, Defendants Armando Christian Perez *p/k/a* Pitbull, Shaffer Chimere Smith, Jr. *p/k/a* Ne-Yo, Nick Van De Wall *p/k/a* Afrojack, J Records, Sony Music Entertainment, Sony Music Holdings, Inc., RCA Music Group, Polo Grounds Music, Polo Grounds Music Publishing, Inc. and Polo Grounds Music, Inc.'s (collectively, "Defendants"), will move this Court before the Honorable Denis R. Hurley, United States District Judge, at the United States Courthouse, 100 Federal Plaza, Central Islip, New York, on or before July 17, 2012, for an order awarding Defendants their attorneys' fees and costs in connection with their defense of this litigation, and such other and further relief as

this Court deems just and proper, pursuant to this Court's inherent powers, 28 U.S.C. §1927, and Fed. R. Civ. P. 11.

Dated: May 21, 2012

New York, New York

**KASOWITZ, BENSON, TORRES & FRIEDMAN LLP**

By: 

Marcos Daniel Jiménez, Esq.  
Audrey M. Pumariega, Esq.  
1441 Brickell Avenue, Suite 1420  
Miami, Florida 33131  
(305) 377-1666

Sarah Gibbs Leivick, Esq.  
1633 Broadway  
New York, New York 10019  
(212) 506-1700  
*Attorneys for Defendants*

To:

Stephanie G. Ovadia, Esq.  
Anand Ahuja, Esq.  
626 RXR Plaza  
6<sup>th</sup> Floor  
Uniondale, New York 11556  
*Attorneys for Plaintiff*